

EXHIBIT P

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

COAST TO COAST TITLE, LLC, et al.,	§	
	§	
Plaintiffs	§	Civil Action No. 4:24-cv-02767
	§	
v.	§	
	§	
TYRRELL L. GARTH, et al.,	§	
	§	
Defendants.	§	
	§	
	§	

DECLARATION OF TYRRELL L. GARTH

My name is Tyrrell L. Garth. I am more than twenty-one years of age. I am of sound mind and competent to make this Declaration. I have personal knowledge of the facts stated herein, and I can attest that they are true and correct.

1. I am a defendant in the above-captioned matter. I have personal knowledge of and am personally acquainted with the Starrex Promissory Notes, Starrex Promissory Note Security Agreements, HMH Contribution Agreements, Letter of Intent, BSpoke Settlement Agreement, and First Amended and Restated Company Agreement of Coast to Coast Title, LLC.

2. The following documents that are attached as exhibits to Tyrrell L. Garth and Phillip H. Clayton’s Motion to Dismiss Plaintiffs’ Second Amended Complaint are true and correct copies of the documents they purport to be, including all indexes, schedules, and attachments thereto:

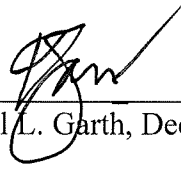
EXHIBIT A	Starrex Promissory Note with Coast to Coast Title, LLC
EXHIBIT B	Starrex Promissory Note with Sol City Title, LLC
EXHIBIT C	Starrex Promissory Note with Magnolia Title Arkansas, Ltd.

EXHIBIT D	Starrex Promissory Note with Magnolia Title Florida, LLC
EXHIBIT E	Starrex Promissory Note Security Agreement with Coast to Coast Title, LLC
EXHIBIT F	Starrex Promissory Note Security Agreement with Sol City Title, LLC
EXHIBIT G	Starrex Promissory Note Security Agreement with Magnolia Title Arkansas, Ltd.
EXHIBIT H	Starrex Promissory Note Security Agreement with Magnolia Title Florida, LLC
EXHIBIT I	HMH Contribution Agreement for Coast to Coast Title, LLC
EXHIBIT J	HMH Contribution Agreement for Sol City Title, LLC
EXHIBIT K	HMH Contribution Agreement for Magnolia Title Arkansas, LLC
EXHIBIT L	HMH Contribution Agreement for Magnolia Title Florida, LLC
EXHIBIT M	Letter of Intent
EXHIBIT N	BSpoke Settlement Agreement
EXHIBIT O	First Amended and Restated Company Agreement of Coast to Coast Title, LLC

JURAT

My name is Tyrrell L. Garth, my date of birth is June 27, 1948, and my address is 7350 Phelan Blvd, Beaumont, Texas. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Jefferson County, State of Texas on the 21st day of March, 2025.



 Tyrrell L. Garth, Declarant